

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

2015 MAR 19 PM 1:16

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

No. **2 - 15 C R - 038 - J**

TRENT MICHAEL COOK (01)
BRITT MICHAEL GRESHAM (02)
BRIAN KEITH HODGE (03)

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Interfere with Commerce by Robbery
(Violation of 18 U.S.C. § 1951)

Beginning on or about a date unknown to the grand jury and continuing until on or about December 20, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Trent Michael Cook, Britt Michael Gresham, and Brian Keith Hodge**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with persons known and unknown to the grand jury to commit an offense against the United States, that is, to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in the possession, care, custody, management, and control of Rochester Armored Car Company, Inc. (Rochester Armored), in violation of Title 18, United States Code, Section 1951.

BACKGROUND

1. That at all times material to this Indictment, Rochester Armored was an armored car company headquartered in Omaha, Nebraska, with business operations in Texas, Nebraska, South Dakota, North Dakota, Minnesota, Iowa, and Wisconsin.

2. That at all times material to this Indictment, Rochester Armored was engaged in the transportation of United States currency, storage of money, servicing of Automatic Teller Machines for financial institutions, all in interstate commerce, an industry which affects interstate commerce.

MANNER AND MEANS

The said unlawful conspiracy was to be accomplished by the following means and in the following manner, among other manner and means:

1. It was part of the conspiracy that **Trent Michael Cook**, defendant, would purchase firearms to be used in the robbery of Rochester Armored in Amarillo, Texas;

2. It was further part of the conspiracy that **Brian Keith Hodge**, defendant, would obtain a location in Colorado for the defendants to hide after the robbery;

3. It was further part of the conspiracy that **Trent Michael Cook** and **Britt Michael Gresham**, defendants, would purchase a van that would be used for loading and transporting bags of United States currency to be taken from Rochester Armored;

4. It was further part of the conspiracy that **Trent Michael Cook**, would use his status as an employee of Rochester Armored to gain access to the company vault containing millions of dollars of United States currency, in order for **Trent Michael Cook**,

Britt Michael Gresham, and, **Brian Keith Hodge**, to rob Rochester Armored, of said currency, while armed with firearms; and

5. It was further part of the conspiracy that **Trent Michael Cook**, **Britt Michael Gresham**, and **Brian Keith Hodge**, would use firearms to commit the robbery, as a means of actual and threatened force, violence, and fear of injury, directed against employees of Rochester Armored, and other persons.

OVERT ACTS

In furtherance of this conspiracy and to effect the objects thereof, the conspirators committed, among others, the following overt acts in the Northern District of Texas and elsewhere:

1. In early December 2014, **Trent Michael Cook** and **Britt Michael Gresham**, defendants, discussed the plan to rob Rochester Armored in Amarillo, Texas, of United States Currency.

2. In early December 2014, **Britt Michael Gresham**, defendant, traveled to Amarillo, Texas.

3. On or about December 10, 2014, **Brian Keith Hodge**, defendant, attempted to buy a white van.

4. On or about December 11, 2014, **Trent Michael Cook**, defendant purchased from Gander Mountain in Amarillo, Texas, a Smith and Wesson, Model M&P 15, .223 caliber rifle; a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HUL3884; a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number

HUL3895; and a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HSS3758.

5. On or about December 10, 2014, **Brian Keith Hodge**, defendant, rented a storage unit in Amarillo, Texas.

6. On or about December 10, 2014, **Brian Keith Hodge**, defendant, traveled with \$30,000 in United States currency to Aurora, Colorado, to meet another person, in order to secure a place for the defendants to hide after the robbery of Rochester Armored in Amarillo, Texas.

7. On or about December 17, 2014, **Trent Michael Cook**, defendant purchased a shooter's card.

8. In or about December, 2014, **Trent Michael Cook** and **Britt Michael Gresham**, defendants, practiced shooting firearms.

9. On or about December 17, 2014, **Trent Michael Cook** and **Britt Michael Gresham**, defendants, purchased a white van.

10. On or about December 20, 2014, **Britt Michael Gresham**, and **Brian Keith Hodge**, defendants, arrived at Rochester Armored in Amarillo, Texas, in a Suburban, each armed with Smith and Wesson, Model M&P, 9 millimeter caliber pistols and parked outside, for the purpose of robbing Rochester Armored.

11. On or about December 20, 2014, **Trent Michael Cook**, defendant, who was then an employee of Rochester Armored Car in Amarillo, Texas, entered the premises of the company, and waited outside of the company vault armed with a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, for the purpose of robbing Rochester Armored Car, of United States currency.

All in violation of Title 18, United States Code, Section 1951.

Count Two

Attempt to Interfere with Commerce by Robbery and Aiding and Abetting
(Violation of 18 U.S.C. §§ 1951 and 2)

On or about December 20, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Trent Michael Cook, Britt Michael Gresham, and Brian Keith Hodge**, defendants, did unlawfully attempt to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendants, **Trent Michael Cook, Britt Michael Gresham, and Brian Keith Hodge**, did attempt to unlawfully take and obtain property consisting of United States currency from the person and presence of employees of Rochester Armored Car Company, Inc., against said employees will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property in their possession, that is, by brandishing firearms at the employees of Rochester Armored Car Company, Inc., and otherwise threatening the use of firearms while demanding and taking United States currency in the vault at Rochester Armored Car Company, Inc.

In violation of Title 18, United States Code, Sections 1951 and 2.

Count Three

Possession of Firearms in Furtherance of a Violent Crime and Aiding and Abetting
(Violation of 18 U.S.C. §§ 924(c)(1)(A) and 2)

Beginning on or about a date unknown to the grand jury and continuing until on or about December 20, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Trent Michael Cook, Britt Michael Gresham, and Brian Keith Hodge**, defendants, did knowingly possess firearms, to wit: (1) a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HUL3884; (2) a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HUL3895; and (3) a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HSS3758, in furtherance of violent crimes, that is, Conspiracy to Interfere with Commerce by Threats and Violence and Attempt to Interfere with Commerce by Threats and Violence, in violation of Title 18, United States Code, Section 1951, as charged in count one and two of this indictment, offenses for which they may be prosecuted in a Court of the United States.

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2, the penalty for which is found in Title 18, United States Code, Section 924(c)(1)(A)(i).

Count Four
Conspiracy to Commit Bank Theft
(Violation of 18 U.S.C. § 371)

Beginning on or about a date unknown to the grand jury and continuing until on or about December 22, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Trent Michael Cook** and **Britt Michael Gresham**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with persons known and unknown to the grand jury to commit an offense against the United States; that is, to take and carry away, with intent to steal, money, of a value exceeding \$1000, belonging to a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(b).

MANNER AND MEANS

It was part of this conspiracy that one or more of the conspirators would and did:

1. Determine the amount of United States currency in an armored car operated by Rochester Armored Car Company, Inc., said money belonging to banks then insured by the Federal Deposit Insurance Corporation;
2. Arrange for a conspirator to bring a vehicle to transport the United States currency taken from the armored car; and
3. Abandon the armored car after removing the United States currency.

OVERT ACTS

In furtherance of this conspiracy and to effect the objects thereof, the conspirators committed, among others, the following overt acts in the Northern District of Texas and elsewhere:

1. Count Seven of this indictment is hereby incorporated as an overt act of this conspiracy.

In violation of Title 18, United States Code, Section 371.

Count Five
Bank Theft
(Violation of 18 U.S.C. § 2113(b))

On or about December 11, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Trent Michael Cook**, defendant, did take and carry away, with intent to steal and purloin, money, of a value exceeding \$1000, belonging to, and in the care, custody, control, management, and possession of Happy State Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(b).

Count Six
Bank Theft
(Violation of 18 U.S.C. § 2113(b))

On or about December 16, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Trent Michael Cook**, defendant, did take and carry away, with intent to steal and purloin, money, of a value exceeding \$1000, belonging to, and in the care, custody, control, management, and possession of Amarillo National Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(b).

Count Seven

Bank Theft and Aiding and Abetting
(Violation of 18 U.S.C. §§ 2113(b) and 2)

On or about December 22, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Trent Michael Cook** and **Britt Michael Gresham**, defendants, did take and carry away, with intent to steal and purloin, money, of a value exceeding \$1000, belonging to, and in the care, custody, control, management, and possession of Wells Fargo Bank, N.A.; Happy State Bank; Amarillo National Bank; and Elan Financial, a subsidiary of USBancCorp, banks whose deposits were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(b) and 2.

Count Eight
Accessory After the Fact
(Violation of 18 U.S.C. § 3)


On or about December 22, 2014, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Brian Keith Hodge**, defendant, knowing that an offense against the United States had been committed, to wit, bank larceny, a violation of Title 18, United States Code, Section 2113(b), did receive, relieve, comfort, and assist the offender, Trent Michael Cook, in order to hinder and prevent the offender's apprehension, trial, and punishment.

In violation of Title 18, United States Code, Section 3.


Forfeiture Notice
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

Upon conviction of an offense alleged in count one, count two, or count three of this indictment, and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), **Trent Michael Cook, Britt Michael Gresham, and Brian Keith Hodge**, defendants, shall forfeit to the United States of America any firearm and ammunition involved in or used in the knowing commission of the offenses, including, but not limited to, the following: (1) a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HUL3884; (2) a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HUL3895; and (3) a Smith and Wesson, Model M&P, 9 millimeter caliber pistol, serial number HSS3758,.

A TRUE BILL:


FOREPERSON

JOHN R. PARKER
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BRIAN KEITH HODGE (03)

INDICTMENT

COUNT 1: CONSPIRACY TO INTERFERE WITH COMMERCE BY ROBBERY
Title 18, United States Code, Section 1951.

COUNT 2: INTERFERENCE WITH COMMERCE BY ROBBERY AND AIDING AND ABETTING
Title 18, United States Code, Sections 1951 and 2.

COUNT 3: POSSESSION OF FIREARMS IN FURTHERANCE OF A VIOLENT CRIME AND AIDING AND ABETTING
Title 18, United States Code, Sections 924(c)(A) and 924(c)(1)(A)(i).

COUNT 4: CONSPIRACY TO COMMIT BANK THEFT
Title 18, United States Code, Section 371.

COUNT 5: BANK THEFT
Title 18, United States Code, Section 2113(b).

COUNT 6: BANK THEFT
Title 18, United States Code, Section 2113(b).

COUNT 7: BANK THEFT AND AIDING AND ABETTING
Title 18, United States Code, Sections 2113(b) and 2.

COUNT 8: ACCESSORY AFTER THE FACT
Title 18, United States Code, Section 3.

FORFEITURE NOTICE
(8 COUNTS)

A true bill rendered:

Amarillo

Filed in open court this
A.D. 2015.

19th day of March,
[Signature] Foreperson

Clerk

ARREST WARRANTS TO ISSUE

[Signature]
UNITED STATES DISTRICT JUDGE